

**Amendments to the Claims:**

1. (Withdrawn) A method to evaluate anti-money laundering risk, comprising:
  - presenting a graphical user interface for a user to select or enter a response or answer to each of a multiplicity of criteria or questions associated with a group including a selected country, a selected financial product or investment, and a selected customer type, wherein the multiplicity of criteria or questions presented in the graphical user interface comprises:
    - allowing selecting or entering if the selected country is a cooperative jurisdiction;
    - allowing selecting or entering an International Narcotics Strategy Report Rating associated with the selected country;
    - allowing selecting or entering if the selected country is a member of the Financial Task Force on Money Laundering (FATF);
    - allowing selecting or entering if the selected country was a party to a 1988 United Nations Convention;
    - allowing selecting or entering a quality of local laws and regulations associated with the selected country;
    - allowing selecting or entering a level of government support in the selected country related to enforcement of laws and regulations and prosecution of offenders;
    - allowing selecting or entering a strength of banking industry associated with the selected country; and
    - allowing selecting or entering a quality of banking regulation and oversight associated with the selected country;
  - calculating a risk rating based on a set of values, each value being assigned to one of a plurality of different enterable or selectable responses or answers for each of the multiplicity of criteria or questions associated with the group including the selected country, the selected financial product or investment, and the selected customer type;
  - presenting the risk rating to a user; and

performing a predetermined function related to anti-money laundering in response to the risk rating..

2. (Cancelled)
3. (Cancelled)
4. (Withdrawn) The method of claim 1, further comprising:  
allowing selecting or entering if the selected customer type is currently being monitored;  
allowing selecting or entering a level of knowledge about the selected customer type; and  
allowing selecting or entering if the selected customer type is a risk for certain activities.
5. (Withdrawn) The method of claim 1, further comprising:  
allowing input of a level of customer knowledge or sophistication needed to deal in the selected financial product or investment;  
allowing input of a level of sophistication or complexity of the selected financial product or investment;  
determining the selected product or investment's propensity for use in money laundering activity;  
determining an ease of access to the selected financial product or investment; and  
determining the selected financial product or investment's attractiveness for use by terrorist.
6. (Withdrawn) The method of claim 1, wherein calculating the risk rating comprises one of calculating an average of the set of values or a weighted average of the set of values.
7. (Withdrawn) The method of claim 1, further comprising calculating at least one of a country risk rating, a customer type risk rating, a product risk rating and a relationship risk rating.

8. (Withdrawn) The method of claim 1, further comprising presenting a graphical user interface for a user to enter at least one of an identification for a legal entity to be evaluated, a country associated with the legal entity to be evaluated, at least one financial product or investment associated with the legal entity to be evaluated, and at least one customer type associated with the legal entity to be evaluated.

9. (Withdrawn) The method of claim 1, further comprising presenting a graphical user interface to edit the plurality of different possible or selectable responses or answers for each of the multiplicity of criteria or questions and values assigned to each of the plurality of responses or answers.

10. (Withdrawn) The method of claim 1, wherein presenting a graphical user interface for a user comprises presenting a graphical user interface for a user to further select if the selected country is on an Office of Foreign Asset Control (OFAC) list.

11. (Currently Amended) A method to evaluate anti-money laundering risk, comprising:  
~~presenting a graphical user interface using a computer processor for a user to select or enter a response or answer to each of a multiplicity of criteria or questions associated with a group including a selected country, a selected financial product or investment, and a selected customer type, wherein the multiplicity of criteria or questions presented in the graphical user interface comprises:~~

~~allowing identifying a person or other legal entity to be evaluated;~~  
~~allowing selecting a country associated with the person or other legal entity;~~  
~~allowing selecting at least one financial product or investment associated with the person or other legal entity;~~  
~~allowing selecting a customer type associated with the person or other legal entity;~~  
~~allowing inputting of the person or other legal entity's sophistication; and~~  
~~allowing inputting of a level of complexity of the at least one selected financial product or investment;~~

determining a risk rating for evaluating anti-money laundering risk, using a computer, based on ~~the~~ responses to predetermined criteria or questions related to the ~~selected~~ country, the at least one ~~selected~~ financial product or investment and the ~~selected~~ customer type, wherein the determining the risk rating comprises:

~~evaluating the person or other legal entity's a sophistication of the person or other legal entity with respect to the at least one selected financial product or investment; and~~

~~determining the at least one selected financial product or investment's propensity for use for money laundering;~~

~~determining the at least one selected financial product or investment's attractiveness for use by terrorist;~~

~~evaluating the level of complexity of the at least one selected financial product or investment;~~

~~determining if the at least one selected financial product or investment is currently monitored for use with respect to illegal activity;~~

~~determining a level of the person or other legal entity's knowledge of the at least one financial product or investment; and~~

~~determining a level of ease of obtaining and using the at least one financial product or investment; and~~

presenting the risk rating to a user.

12. (Original) The method of claim 11, wherein determining the risk comprises setting a value corresponding to each of the responses to the predetermined criteria or question.

13. (Original) The method of claim 12, wherein determining the risk comprises calculating one of an average or a weighted average of the values based on the selected country, the at least one selected financial product or investment and the selected customer type.

14. (Currently Amended) The method of claim 11, wherein determining the risk further comprises at least one two of:

evaluating if the selected country is a cooperative jurisdiction;  
determining if the selected country was a party to the 1988 United Nations Convention on drugs;  
evaluating a quality of banking regulation and oversight in the selected country;  
determining if the selected country is associated with terrorist related activity or on the Office of Foreign Asset Control (OFAC) list;  
evaluating a quality of local laws of the selected country; entering an International Narcotics Strategy Report Rating for the selected country;  
evaluating a level of government support in the selected country for enforcement of laws and regulations and prosecution of offenses;  
determining if the selected country is a member of Financial Action Task Force on Money Laundering (FATF); and  
determining strength of a banking industry in the selected country.

15. (Cancelled)
16. (Previously Presented) The method of claim 11, wherein determining the risk comprises:  
determining if the person or other legal entity is currently being monitored with respect to financial activity;  
determining a level of risk of the person or other legal entity being associated with terrorist activity;  
evaluating a level of knowledge about the person or other legal entity; and  
determining if the person or other legal entity is known to be a high risk.
17. (Currently Amended) A system to evaluate anti-money laundering risk, comprising:  
a server; and  
a risk rating tool operable on the server,  
wherein the risk rating tool is adapted to determine a risk rating of a person or other legal entity to be evaluated based on responses to predetermined criteria related to a selected country

associated with the person or other legal entity, at least one selected financial product associated with the person or other legal entity, and a selected customer type associated with the person or other legal entity; and

wherein the risk rating tool is programmed to determine a risk rating based on responses to the predetermined criteria related to at least one selected financial product or investment, the predetermined criteria ~~being selected or entered into a graphical user interface and comprising:~~

a customer sophistication with respect to the selected financial product or investment;

a propensity of the selected financial product or investment for use for money laundering;

~~an attractiveness of the selected financial product or investment for use by terrorist;~~

~~a level of complexity of the financial product or investment;~~

~~a current monitoring of the financial product or investment for use with respect to illegal activity;~~

~~a level of a customer's or public's knowledge of the financial product or investment; and~~

~~a level of ease of obtaining and using the financial product or investment.~~

18. (Cancelled)

19. (Original) The system of claim 18, further comprising a value being set corresponding to each of the responses to the predetermined criteria.

20. (Original) The system of claim 19, wherein the risk rating tool is programmed to calculate one of an average or a weighted average of the values based on the selected country, the at least one selected financial product and the selected customer type.

21. (Cancelled)

22. (Cancelled)
23. (Previously Presented) The system of claim 17, wherein the risk rating tool is further programmed to determine a risk rating based on responses to predetermined criteria related to a selected customer type, the predetermined criteria comprising:
  - a customer currently being monitored with respect to financial activity;
  - a level of risk of the customer being involved in terrorist activity;
  - a level of a financial institutions knowledge of its customer; and
  - the customer being known to be a high risk.
24. (Previously Presented) The system of claim 17, wherein the risk rating tool is further programmed to calculate a risk rating based on a set of values, each value being assigned to one of a plurality of different possible or selectable responses or answers for each of a multiplicity of criteria or questions associated with a group including at least one of a selected country, a selected financial product or investment and a selected customer type.
25. (Original) The system of claim 24, further comprising a database including reports used to determine each of the set of values.
26. (Currently Amended) The system of claim 17, wherein the risk rating tool is programmed to present a graphical user interface for a user to select at least one each of:
  - if the selected country is a cooperative jurisdiction;
  - if the selected country is on an Office of Foreign Asset Control (OFAC) list;
  - an International Narcotics Strategy Report Rating associated with the selected country;
  - if the selected country is a member of the Financial Task Force on Money Laundering (FATF);
  - if the selected country was a party to a 1988 United Nations Convention;
  - a quality of local laws and regulations associated with the selected country;

a level of government support related to enforcement of laws and regulations and prosecution of offenses;

a strength of a banking industry associated with the selected country; and

a quality of banking regulation and oversight associated with the selected country.

27. (Withdrawn) A method for making a system to evaluate anti-money laundering risk, comprising:

providing a server; and

providing a risk rating tool operable on the server, wherein the risk rating tool determines a risk rating based on responses to predetermined criteria related to a selected country, at least one of a selected financial product and a selected customer type, the risk rating tool provides a risk rating output to a user; and

adapting the risk rating tool to determine the risk based on responses to predetermined criteria, the predetermined criteria comprising:

a level of cooperativeness of the selected country with respect to anti-money laundering; the selected country being a party to the 1988 United Nations Convention;

a quality of banking regulations and oversight in the selected country;

the selected country being associated with terrorist related activity;

the selected country being on an Office of Foreign Asset Control (OFAC) list;

a quality of local laws of the selected country;

an International Narcotics Strategy Report Rating for the selected country;

a level of government support in the selected country for enforcement of laws and regulations and prosecution of offenses;

the selected country being a member of the Financial Action Task Force on Money Laundering (FATF); and

a strength of the banking system in the selected country.

28. (Cancelled)

29. (Cancelled)

30. (Withdrawn) A computer-readable medium having computer-executable instructions for performing a method, comprising:

presenting a graphical user interface for a user to select or enter a response or answer to each of a multiplicity of criteria or questions associated with a group including a selected country, a selected financial product or investment, and a selected customer type, wherein the multiplicity of criteria or questions presented in the graphical user interface comprises:

allowing selecting or entering if the selected country is a cooperative jurisdiction;

allowing selecting or entering an International Narcotics Strategy Report Rating associated with the selected country;

allowing selecting or entering if the selected country was a party to a 1988 United Nations Convention;

allowing selecting or entering a quality of local laws and regulations associated with the selected country;

allowing selecting or entering a level of government support related to enforcement of laws and regulations and prosecution of offenses; and

allowing selecting or entering a strength of a banking industry associated with the selected country; and

allowing selecting or entering a quality of banking regulation and oversight associated with the selected country;

calculating a risk rating based on a set of values, each value being assigned to one of a plurality of different possible enterable or selectable responses or answers for each of the multiplicity of criteria or questions associated with the group including at least one of the selected country, the selected financial product or investment and the selected customer type; and presenting the risk rating to a user.

31. (Withdrawn) The computer-readable medium having computer executable instructions for performing the method of claim 30, wherein calculating a risk rating comprises one of calculating an average of the set of values or a weighted average of the set of values.
32. (Withdrawn) The computer-readable medium having computer executable instructions for performing the method of claim 30, further comprising calculating at least one of a country risk rating, a customer type risk rating, a product risk rating and a relationship risk rating.
33. (Withdrawn) The computer-readable medium having computer executable instructions for performing the method of claim 30, further comprising presenting a graphical user interface for a user to enter at least one of an identification for a legal entity to be evaluated, a country associated with the legal entity to be evaluated, at least one financial product or investment associated with the legal entity to be evaluated, and a customer type associated with the legal entity to be evaluated.
34. (Withdrawn) The computer-readable medium having computer executable instructions for performing the method of claim 30, further comprising presenting a graphical user interface to edit the plurality of different possible or selectable responses or answers for each of the multiplicity of criteria or questions and values assigned to each of the plurality of responses or answers.
35. (Withdrawn) The computer-readable medium having computer executable instructions for performing the method of claim 30, wherein determining the risk comprises calculating one of an average or a weighted average of the values based on the selected country, the at least one selected financial product and the selected customer type.
36. (Withdrawn) The computer-readable medium having computer executable instructions for performing the method of claim 30, wherein presenting a graphical user interface for a user comprises presenting a graphical user interface for a user to further select at least one of:

if the selected country is on an Office of Foreign Asset Control (OFAC) list; and  
if the selected country is a member of the Financial Task Force on Money Laundering (FATF).

37. (New) The method of claim 11, wherein the determining the risk rating comprises at least one of:

- determining the at least one selected financial product or investment's attractiveness for use by terrorist;
- evaluating the level of complexity of the at least one selected financial product or investment;
- determining if the at least one selected financial product or investment is currently monitored for use with respect to illegal activity;
- determining a level of the person or other legal entity's knowledge of the at least one financial product or investment; and
- determining a level of ease of obtaining and using the at least one financial product or investment.

38. (New) The method of claim 11, further comprising presenting a graphical user interface using a computer processor for a user to enter a response to each of a multiplicity of criteria or questions associated with a group including the selected country, the selected financial product or investment, and the selected customer type.

39. (New) The method of claim 38, wherein the multiplicity of criteria or questions comprises:

- identifying the person or other legal entity to be evaluated;
- selecting the country associated with the person or other legal entity;
- selecting the at least one financial product or investment associated with the person or other legal entity; and
- selecting the customer type associated with the person or other legal entity.

40. (New) The method of claim 11, wherein the determining a risk rating comprises calculating a risk rating based on a set of values, each value being assigned to one of a plurality of different possible or selectable responses or answers for each of a multiplicity of criteria or questions associated with a group including at least one of a selected country, a selected financial product or investment, and a selected customer type

41. (New) The method of claim 11, further comprising defining the multiplicity of criteria or questions comprising at least one of:

- determining whether the selected country is cooperative;
- determining if the selected country is on an Office of Foreign Asset Control (OFAC) list;
- determining an International Narcotics Strategy Report Rating;
- determining if the selected country is a member of the Financial Task Force on Money Laundering (FATF);
- determining if the selected country was a party to a 1988 United Nations Convention on drugs;
- determining a quality of local laws and regulations;
- determining a level of government support related to law enforcement and prosecution of offenders;
- determining a strength of the selected country's banking industry; and
- determining a quality of banking regulation and oversight.

42. (New) The system of claim 17, wherein the predetermined criteria is selected or entered into a graphical user interface and comprises:

- a customer sophistication with respect to the selected financial product or investment;
- a propensity of the selected financial product or investment for use for money laundering;
- an attractiveness of the selected financial product or investment for use by terrorist;
- a level of complexity of the financial product or investment;
- a current monitoring of the financial product or investment for use with respect to illegal activity;

a level of a customer's or public's knowledge of the financial product or investment; and  
a level of ease of obtaining and using the financial product or investment.